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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
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15 UNITED STATES OF AMERICA,) NO. CR 17-00231-WHA
)
16 Plaintiff,) STIPULATION AND PROPOSED ORDER TO
) CONTINUE
17 v.)
)
18 LIPINE FAAFIU,) Court: Hon. William Alsup
)
19 Defendant.)
)
20)

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22 IT IS HEREBY STIPULATED, by and between the parties to this action, the United States of
23 America and defendant, Lipine Faafiu, that the status conference in the above-captioned matter,
24 presently scheduled for August 15, 2017 at 2:00 a.m., be continued to September 12, 2017. The reasons
25 for this request are as follow: First, government counsel will be out of the district and unavailable on
26 August 15, 2017. The parties are also continuing to work on a resolution of this matter, and believe that
27 an additional continuance will assist in that. Finally, the defense is continuing to review the discovery
28 that the government provided since the last appearance. Accordingly, the parties jointly request that the

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matter be continued to September 12, 2017 at 2:00 p.m.

The parties also move for an exclusion of time pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv) for continuity of counsel and so that defense counsel may have time to further investigate this matter, and confer with the defendant, taking into account the exercise of due diligence. The parties hereby stipulate that there is good cause—taking into account the public interest in the prompt disposition of this case—to exclude the time from August 15, 2017 to September 12, 2017 from computation under the Speedy Trial Act, and that failing to exclude that time would unreasonably deny the defendant and his counsel the reasonable time necessary for effective preparation of counsel taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further agree that the ends of justice would be served by excluding the time from August 15, 2017 to September 12, 2017 from computation under the Speedy Trial Act and that the need for the exclusion outweighs the best interests of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Respectfully submitted,

DATED: August 8, 2017

BRIAN J. STRETCH
United States Attorney

/s/

 CLAUDIA A. QUIROZ
 Assistant United States Attorney

/s/


JODI LINKER
Attorney for Lipine Faafiu

1 ~~PROPOSED~~ ORDER

2 Good cause having been shown, the Court HEREBY ORDERS that the period from August 15,
3 2017 to September 12, 2017 is excluded from the Speedy Trial Act calculations. The Court finds that
4 the ends of justice served by excluding that period from Speedy Trial Act calculations outweighs the
5 interests of the public and the defendant in a speedy trial by allowing for the defense to prepare
6 effectively, and for continuity of defense counsel, in accordance with 18 U.S.C. § 3161(h)(7)(A) and
7 (B)(iv).

8 IT IS SO ORDERED.

9 DATED: August 10, 2017.

10 
11 HONORABLE WILLIAM ALSUP
12 United States District Judge

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15 Attestation of Filer

16 In addition to myself, the other signatory to this document is Jodi Linker. I attest that I have her
17 permission to enter a conformed signature on her behalf and to file the document.

18 DATED: August 8, 2017

19 _____/s/_____
20 CLAUDIA A. QUIROZ
21 Assistant United States Attorney
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